

## **INSPECTIONS**

### INTRODUCTION

Inspections play a large and important role in the Housing Choice Voucher (HCV) Program for public housing agencies (PHAs), landlords, and tenants. Inspections are required by law and periodic inspections take place throughout tenancy, in addition to the initial inspection. Issues with the inspection process may reduce the safety of the residence and have financial repercussions for landlords. Inspection timing and results can determine how quickly a resident can move in and determine whether a landlord will receive a Housing Assistance Payment (HAP), or cause a delay or stoppage of HAP. Landlords may have to make repairs or keep a unit vacant to resolve deficiencies. With so much riding on inspections, it's easy to see why they can be a source of confusion and tension between landlords and PHAs.

## The following strategies are included in this section:

#### Strategies to ensure consistent inspections:

- Inspections Guidance for Landlords
- Consistent Inspections

# Strategies to facilitate efficiency in the scheduling and completion of inspections:

- Inspections Scheduling
- Administrative Inspections Flexibilities

#### Related strategies:

- Technology
- Education and Outreach
- Monetary Incentives and Reimbursement Funds
- Partnerships

The strategies in this inspections chapter address the following areas:

## **Inspections Process Improvements**

| PHA Process Improvement                 | Inspections<br>Guidance for<br>Landlords | Consistent<br>Inspections | Inspections<br>Scheduling | Administrative<br>Inspections<br>Flexibilities |
|---|--|---------------------------|---------------------------|--|
| Increase Recruitment                    |  |                           |                           |  |
| Increase Retention                      | X  | X                         | X                         | X  |
| Improve Responsiveness                  |  | X                         | X                         |  |
| Improve Tenant-Landlord<br>Relationship |  | X                         |                           |  |
| Improve Inspections Process             | X  | X                         | X                         | X  |
| Minimize Bureaucracy                    | X  |                           | X                         | X  |

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In this chapter of the Guidebook, strategies and their associated activities are grouped in two categories of PHA goals to increase landlord satisfaction by ensuring:

- Inspection requirements and execution are shown to be carried out consistently
- Scheduling and completion of inspections are efficiently facilitated

Many of the PHA activities involve an internal review of current inspection policies and procedures, followed by administrative changes. There are also several existing flexibilities PHAs can choose to implement which may require administrative changes but can dramatically reduce the administrative burden on both landlords and the PHA. The majority of the activities are low-cost to implement and can be combined with other strategies throughout the Guidebook to maximize the PHA's return on investment in time, staffing, procedure changes, and financial costs.

These strategies, as a whole, aim to help the PHAs make the inspection process more transparent and efficient for landlords. They offer PHAs additional options for some of the more cumbersome elements of the inspection process. Landlords who know what to expect will be better equipped to take appropriate and timely steps when faced with challenges in the process—including a failed inspection. Wellinformed landlords may also be able to avoid these challenges by acting proactively and making repairs prior to an initial inspection.

**Note:** These strategies may combine well with some of the *Administrative Flexibilities to* Enhance Landlord Satisfaction available as part of the HUD HCV Landlord Strategies Guidebook.

## **OVFRVIFW**

This chapter will examine ways PHAs can improve the inspection experience for landlords, beginning with an overview of the inspection process. While many may be familiar with the process, this information is helpful to keep in mind while reviewing the strategies presented in the remainder of this chapter.



## NOTICE: TERMINOLOGY

- Units inspections are conducted using Housing Quality Standards (HQS) or any subsequent HUD-established physical inspection standards.
- Units fail these inspections because they had an item, or combination of items, that did not meet the standards. These individual deficiencies can also be called "fails" by PHA staff.

#### Why Are Inspections Important?

The purpose of inspections mirrors the goal of PHAs to ensure decent, safe, and habitable housing. Inspections provide opportunities for PHAs to visit a unit and monitor adherence to HUD-established physical inspection standards. It's also important to note that inspections provide the same opportunities for landlords—a time when landlords can receive an outside evaluation on the condition of their property. While some landlords may view these visits as a bureaucratic inconvenience, they can be used to prevent potential maintenance issues that might not be caught until move-out.



### News

In late 2019, HUD began a 2-year voluntary demonstration to better identify potential adjustments to standards, protocols, and processes of the National Standards for the Physical Inspection of Real Estate (NSPIRE) model prior to nationwide implementation. One of NSPIRE's core objectives is to align standards across programs in order to provide the same expectation of housing quality for all residents of HUD-assisted housing units. Additional information on NSPIRE and its applicability to HCV can be found here: https://www.hud.gov/program offices/public indian housing/reac/nspire

## The Different Types of Inspections: A Refresher

**Initial** – All units entering the HCV program must have an inspection. In many circumstances, but not all, the initial inspection must take place before the HAP contract is executed.

**Periodic Inspection** – PHAs are required to conduct regular additional inspections. They may conduct these annually or biennially, which needs to be clearly stated in the PHAs' policy documents for consistency and transparency. Additionally, PHAs designated by HUD as "small rural" may decide to carry out inspections on a triennial basis. See the final strategy in this chapter on incorporating administrative flexibilities for additional information.

**Special/complaint** – When the PHA receives a complaint regarding a unit from a tenant or a government official, the PHA must conduct an inspection to investigate the complaint. The timing of the inspection is determined by whether the complaint is for non-life threatening or life-threatening concerns. If the concerns raised are life-threatening, PHAs must call this an emergency inspection and the deficiency must be addressed within 24 hours.

See 24 CFR 982.405 and 85 FR 11381.

#### Marketing and Roll-out

Some changes to the inspection process – such as incorporating administrative flexibilities or standardizing deadlines in policy – will improve the inspection process, but may change an experienced HCV landlord's accustomed inspection routine. The PHA should inform all landlords of changes to the inspection process that require changes on the landlord's part. The PHA may need to provide information on how to make this change or who to contact for additional information. The PHA may wish to make major changes to its inspection process on a trial or limited basis until it has an opportunity to assess any impact these changes make on landlords, tenants, or PHA staff time or other resources.

Certainly, the PHA will want to make certain that landlords are fully informed about any guidance materials on the inspection process or standards that the PHA makes available.

Some changes to the inspection process may improve efficiency without requiring actions on the part of the landlord. These could include changes made by PHA internal staffing including inspectors. In those cases, once the PHA has determined that a change will be incorporated on a permanent basis, the PHA may wish to let the landlords know what the PHA is doing behind the scenes to improve landlord satisfaction and the efficiency of the inspection process.

#### **Evaluation**

PHAs should build in ways to evaluate changes for effectiveness. For example, PHAs that are making improvements to scheduling could review the average time it takes from a request for inspection to the inspection being conducted. Allowing for start-up, the amount of time between the request and the actual inspection should decrease over time.

